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United States Bankruptcy Court

Northern District of Texas Fort Worth Division

In re:	
Marcos Gonzalez-Lopez	Case No. 23-43977-elm
Debtor	Chapter 13

<u>DEBTORS' RESPONSE TO TRUSTEE'S</u> <u>NOTICE OF INTENT TO DISMISS BANKRUPTCY CASE</u>

Marcos Gonzalez-Lopez ("Debtor") file this response in opposition to *Trustee's Notice of Intent to Certify Case for Dismissal* ("Notice") [Docket. No. 62].

Debtor was hospitalized in December 2023 due to a health crisis and was unable to work. Debtor's non-filing spouse has also been unable to work in the last month due to a medical issue. Debtor has been able to go back to work, and recently, he has worked overtime with his employer to increase his income. Debtor's non-filing spouse has been medically released to go back to work on or about May 9, 2024 and will be able to contribute funds toward the plan payments.

Debtor intends to make a full payment on or before May 14 and another full payment on or before May 26, 2024.

For these reasons, the trustee's motion should be denied.

DATED: May 1, 2024. Respectfully submitted:

By: /s/ Clayton L. Everett Clayton L. Everett | State Bar No. 24065212 clayton@norredlaw.com
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Attorney for Marcos Gonzalez-Lopez

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2024, a true and correct copy of the foregoing document was served to all parties receiving notice electronically in this case via the CM/ECF system.

/s/ Clayton L. Everett Clayton L. Everett